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Attorneys for Plaintiff
COUNTY OF LOS ANGELES

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

STATE OF CALIFORNIA, *et al.*,

Plaintiffs,

v.

WILBUR L. ROSS, JR., *et al.*,

Defendants.

) Case No.: 3:18-cv-01865-RS

) **DECLARATION OF DOUGLAS S.**
) **BARON ON BEHALF OF THE COUNTY**
) **OF LOS ANGELES IN OPPOSITION TO**
) **DEFENDANTS ROSS, *ET AL.*'S MOTION**
) **FOR SUMMARY JUDGMENT**

) Date: December 7, 2018

) Time: 10:00 a.m.

) Before: Hon. Richard Seeborg

) Courtroom: 3

1 I, Douglas S. Baron, hereby declare:

2 1. I am a Senior Manager with the Chief Executive Office (“CEO”) of the County of
3 Los Angeles (“the County”). I have been a manager at CEO for over two years, and have
4 worked for the County of Los Angeles in various capacities on fiscal matters for over 17 years.
5 I hold a Bachelor of Arts degree from Princeton University and a Master of Business
6 Administration degree from Stanford University.

7 2. My responsibilities as Senior Manager, CEO for the County include overseeing
8 the Economic Development Division within the CEO. My responsibilities include working on
9 planning and budgeting matters relating to the conduct of the 2020 Census within the County.

10 3. I have been authorized by County Counsel to submit this Declaration on behalf of
11 the County in opposition to the motion for summary judgment of defendants Wilbur Ross, *et al.*
12 Except as otherwise stated below, I have personal knowledge of all facts contained in this
13 Declaration, and if called upon to do so could testify competently to those facts under oath in a
14 court of law, without waiver of any applicable privilege.

15 4. The County’s plans regarding the 2020 Census include plans and preparations for
16 outreach to County residents in advance of the 2020 Census to ensure an accurate and complete
17 count.

18 5. On May 18, 2018, the County’s Sacramento Legislative Office sent a written
19 request to the California Legislature seeking additional outreach funding for the County. A true
20 copy of that written request is attached hereto as **Exhibit A**.

21 6. The County’s written request to the Legislature (Exhibit A) requested an increase
22 in census funding from \$8.7 million to \$12 million and recited that the increased request for
23 funding was “due to the United States Commerce Department’s announcement that a citizenship
24 question will be included in the 2020 Census Form.” In its written request, the County included
25 a breakdown seeking an additional \$1,700,000 for “Outreach to the Entire Immigrant Non-
26 Citizen Population” plus an additional \$1,500,000 for “Outreach to Population with
27 Undocumented Family Member Living in the Same Household”.


7. On or about November 9, 2018, the State of California announced its funding allocations, to be disbursed pursuant to a "County-Optional Agreement to Conduct Outreach Related to the California Complete Count (CCC) 2020 Census." The announced funding allocations were set out as Attachment II to a form letter received by the County CEO and (on information and belief) other counties throughout the State of California. I attach hereto as **Exhibit B** a true copy of the two-page cover letter (minus its exhibits) and Attachment II to the letter, which lists the amount allocated to the County as \$9,393,090, rather than the \$12,000,000 requested by the County in Exhibit A.

8. The amount allocated to the County by the State for purposes of the 2020 Census also is listed on the State's website, at <https://census.ca.gov/wp-content/uploads/sites/4/2018/11/County-Contract-Amounts.pdf>. A printed copy of this online listing, showing the amount allocated to the County as \$9,393,090, is attached hereto as **Exhibit C**.

9. The \$9,393,090 amount allocated by the Legislature for the 2020 Census is \$2,606,910 below the \$12,000,000 amount the County determined to be necessary for outreach in Exhibit A in view of the addition of the citizenship question.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that I have executed this declaration in Los Angeles, California.

Dated: November 16, 2018


DOUGLAS S. BARON